

# Privacy Policy of the GórskieStay mobile application

## 1. General provisions

1.1. This Privacy Policy applies to the mobile application enabling users to book stays, use services and manage a user account at hotel facilities operated by companies from the Górskie Resorły group. The document sets out the rules for processing personal data, including the scope of data, purposes, legal bases, controllers and user rights.

## 2. Information on controllers, data recipients and processing model

### 2.1. Personal data controller

2.1.1. Creating a user account, bookings and stay: the controller of the personal data of an application user, when the user goes in the application to the tab of a specific facility and creates a user account for that facility, will be the company operating that facility. The list of companies that are controllers and their contact details is provided below. Each of the companies is hereinafter referred to as the "controller". The remaining companies do not have access to the user's personal data processed within the application functionality for a given facility.

| Obiekt                              | Adres Obiektu                                     | Kontakt   | Administrator danych osobowych   |
|-------------------------------------|---|---|--|
| Osada Śnieżka                       | Ul. Spacerowa 13<br>58-508 Łomnica k.<br>Karpacza | Inspektor Ochrony Danych:<br>rodo@osada-sniezka.pl        | Osada Śnieżka Operator sp. z o.o.,<br>ul. Widok 8, 00-023 Warszawa                   |
| Blue Mountain Resort                | Ul. 1 Maja 51<br>58-580 Szklarska<br>Poręba       | Inspektor Ochrony Danych:<br>rodo@blue-mountain-resort.pl | Operator Blue Mountain Resort<br>sp. z o.o., ul. Widok 8, 00-023<br>Warszawa         |
| Green Mountain Hotel *****          | Ul. Sarnia 21<br>Karpacz                          | Inspektor Ochrony Danych:<br>rodo@green-mountain.pl       | Osada Śnieżka Operator sp. z o.o.,<br>ul. Widok 8, 00-023 Warszawa                   |
| Green Apartments                    | Ul. Sarnia 21a<br>Karpacz                         | Inspektor Ochrony Danych:<br>rodo@green-mountain.pl       | Osada Śnieżka Operator sp. z o.o.,<br>ul. Widok 8, 00-023 Warszawa                   |
| Green Adults                        | Ul. Wilcza 3C<br>Karpacz                          | Inspektor Ochrony Danych:<br>rodo@green-mountain.pl       | Osada Śnieżka Operator sp. z o.o.,<br>ul. Widok 8, 00-023 Warszawa                   |
| Platinum Mountain Hotel & SPA ***** | Ul. Kilińskiego 15B<br>58-580 Szklarska<br>Poręba | Inspektor Ochrony Danych:<br>rodo@platinum-mountain.pl    | Silver Mountain Resort Operator<br>sp. z o.o. sp.k., ul. Widok 8, 00-023<br>Warszawa |
| Platinum Apartments                 | Ul. Kilińskiego 15B<br>58-580 Szklarska<br>Poręba | Inspektor Ochrony Danych:<br>rodo@platinum-mountain.pl    | Silver Mountain Resort Operator<br>sp. z o.o. sp.k., ul. Widok 8, 00-023<br>Warszawa |
| Platinum Adults                     | Ul. Kilińskiego 15B<br>58-580 Szklarska<br>Poręba | Inspektor Ochrony Danych:<br>rodo@platinum-mountain.pl    | Silver Mountain Resort Operator<br>sp. z o.o. sp.k., ul. Widok 8, 00-023<br>Warszawa |
| Hotel Crystal Mountain *****        | Ul. Bukowa 19 A<br>43-460 Wisła                   | Inspektor Ochrony Danych:<br>rodo@crystal-mountain.pl     | Wisła Mountain Resort Operator<br>sp. z o.o. sp.k., ul. Widok 8, 00-023<br>Warszawa  |
| Elements Hotel & SPA *****          | Ul. Zakopiańska 20a<br>59-850 Świeradów-<br>Zdrój | Inspektor Ochrony Danych:<br>rodo@elements-hotel.pl       | Operator Świeradów Zdrój sp. z<br>o.o. sp.k., ul. Widok 8, 00-023<br>Warszawa        |
| Elements Apartments                 | Ul. Zakopiańska 20a<br>59-850 Świeradów-<br>Zdrój | Inspektor Ochrony Danych:<br>rodo@elements-hotel.pl       | Operator Świeradów Zdrój sp. z<br>o.o. sp.k., ul. Widok 8, 00-023<br>Warszawa        |
| Hotel Linea Mare *****              | Ul. Borka 6<br>72-346 Pobierowo                   | Inspektor Ochrony Danych:<br>iod@lineamare.pl             | Linea Mare Operator sp. z o.o., ul.<br>Widok 8, 00-023 Warszawa                      |

|                          |   |  |  |
|--------------------------|---|--|--|
| Forest Park Resort & SPA | Ul. Źródłana 6B<br>59-850 Świeradów-Zdrój | Inspektor Ochrony Danych:<br>rodo@forest-park.pl | Forest Park Operator sp. z o.o., ul.<br>Widok 8, 00-023 Warszawa   |
| The View Mountain        | Obiekt w realizacji                       | rodo@view-mountain.pl                            | View Mountain Operator sp. z o.o.,<br>ul. Widok 8, 00-023 Warszawa |

2.1.2. Joint functions (e.g. loyalty programme): if two or more companies jointly determine the purposes and means of processing (e.g. a joint loyalty programme), joint controllership of personal data occurs in accordance with Article 26 GDPR. The content of the arrangements concerning the allocation of responsibilities, contact points and rules for handling requests is made available to users in this policy and in the application, if a joint controllership situation arises.

2.1.3. Moving to other facilities: the user may move to further facilities using the user account in the application created upon first entering the selected facility. In this way, user accounts at subsequent facilities are created using the same data (e.g. through a Google account, e-mail address). The company operating the facility where the new account is created obtains access to the user's basic personal data associated with the created account (first name and surname, e-mail address, other login identifiers). This company does not receive data on the user's activity at another facility, in particular booking history or activity in the application. When first moving to a new facility, the user receives information on the processing of personal data by the company operating that facility and has the option to give additional consents to the processing of personal data for marketing purposes.

2.2. Data recipients:

2.2.1. software provider - Betasi sp. z o.o,

2.2.2. entities providing accounting, IT or legal services to the controller,

2.2.3. payment service providers,

2.2.4. providers of analytics services concerning the manner of using the application.

### 3. Categories of data and sources

3.1. Identification and contact data: first name, surname, e-mail address, login data, telephone number.

3.2. Booking data: date of stay, preferences, booking history.

3.3. Billing data: invoice data, bank account number.

3.4. Marketing data and preferences: consents to receive a newsletter or other commercial information, push notifications.

3.5. Technical data: system logs, device/application identifiers, data on use of the application, location data and other application permissions.

3.6. Data sources: data provided by the user, registration data, data generated automatically by the application.

### 4. Purposes, legal bases of processing and personal data retention periods

| Cel                                   | Zakres danych  | Podstawa prawna   | Okres przechowywania   | Kategorie odbiorców                                |
|---------------------------------------|--|---|--|--|
| Założenie i obsługa konta w aplikacji | imię, nazwisko, e-mail, inny identyfikator logowania | wykonanie umowy (art. 6 ust. 1 lit. b RODO)                   | Czas prowadzenia konta powiększony o okres przedawnienia roszczeń                                | Dostawca aplikacji                                 |
| Rezerwacja, obsługa pobytu            | imię, nazwisko, e-mail, numer telefonu, dane         | wykonanie umowy (art. 6 ust. 1 lit. b RODO), obowiązek prawny | Do upływu okresu przedawnienia roszczeń i przez okres wynikający z przepisów prawa dla wykonania | Dostawca aplikacji, dostawca płatności, księgowość |

|                                   |  |  |  |   |
|-----------------------------------|--|--|--|---|
|                                   | rezerwacji, preferencje  | (rachunkowość – art. 6 ust. 1 lit. c RODO)   | obowiązków rachunkowych  |   |
| Obsługa reklamacji i roszczeń     | imię, nazwisko, e-mail, dane rezerwacji, historia pobytu           | uzasadniony interes (art. 6 ust. 1 lit. f RODO)  | Do ustania interesu i zakończenia okresu przedawnienia roszczeń  | Doradcy prawni, księgowość                      |
| Marketing usług                   | e-mail   | uzasadniony interes w związku z wyrażeniem zgody na otrzymywanie informacji handlowych w trybie art. 398 Prawa komunikacji elektronicznej (art. 6 ust. 1 lit. f RODO)            | Do wniesienia sprzeciwu  | Dostawcy usług marketingu i usług analitycznych |
| Analityka i rozwój aplikacji      | dane techniczne, logi (adres IP, identyfikatory sesji)             | uzasadniony interes (w zakresie danych niezbędnych do działania aplikacji) (art. 6 ust. 1 lit. f RODO) / zgoda (w odniesieniu do pozostałych danych) (art. 6 ust. 1 lit. a RODO) | Przez okres retencji logów – 30 dni  | Dostawca aplikacji, usług analitycznych         |
| Utrzymanie bezpieczeństwa systemu | logi (adres IP, identyfikatory sesji), aktywność                   | uzasadniony interes (art. 6 ust. 1 lit. f RODO)  | Przez okres retencji logów – 30 dni  | Dostawca usług IT                               |
| Dostosowanie ofert w aplikacji    | logi (adres IP, identyfikatory sesji), aktywność, historia zakupów | uzasadniony interes – marketing administratora (art. 6 ust. 1 lit. f RODO)   | do czasu wniesienia sprzeciwu, nie dłużej niż do zakończenia korzystania z aplikacji, przy czym dla poszczególnych logów, w oparciu o które dokonywane jest profilowanie – nie dłużej niż 30 dni | Dostawca aplikacji, usług analitycznych         |

## 5. Technical data, logs and security

5.1. When using the application, system logs, device/application identifiers and location data are recorded. They are stored for 30 days.

5.2. Purpose: system security, abuse detection, application development and analytics.

5.3. The controller implements technical and organisational measures: access control, encryption, accountability, confidentiality and data integrity.

## 6. Cookies, advertising identifiers and analytics

6.1. The application may use cookies, advertising identifiers and analytical tools - on the basis of legitimate interest or consent.

6.2. The consent and preference management mechanism is available in the application settings.

## 7. Application permissions

| Uprawnienie                              | Cel  | Czy obowiązkowe | Jak wyłączyć              |
|--|--|-----------------|---------------------------|
| Lokalizacja                              | precyzyjne wskazanie najbliższego miejsca świadczenia usług  | nieobowiązkowe  | w ustawieniach urządzenia |
| Aparat                                   | możliwość korzystania z funkcji skanowania kodów QR  | nieobowiązkowe  | w ustawieniach urządzenia |
| Powiadomienia Push                       | komunikaty marketingowe/systemowe  | nieobowiązkowe  | w ustawieniach aplikacji  |
| Znajdowanie urządzeń Bluetooth w pobliżu | aplikacja może poprosić o dostęp do Bluetooth lub możliwość znajdowania urządzeń w pobliżu w celu obsługi funkcji mobilnego klucza, tj. wykrycia i połączenia się z kompatybilnym zamkiem lub czytnikiem hotelowym | nieobowiązkowe  | w ustawieniach urządzenia |

## 8. Rights of data subjects

8.1. Each data subject has the right to:

- 8.1.1. access data, have it rectified, erased or have processing restricted,
- 8.1.2. data portability to another controller,
- 8.1.3. object, including objecting to direct marketing,
- 8.1.4. withdraw consent to processing, if the user has given it,
- 8.1.5. lodge a complaint with the supervisory authority.

8.2. A request may be submitted to the relevant controller (section 2.1.1.).

8.3. Where data is processed by joint controllers, of which the joint controllers will inform separately, a request may be submitted to the contact point indicated by the Joint Controllers. The Joint Controllers establish procedures for mutual cooperation, forwarding requests and response deadlines.

## 9. Voluntary/mandatory provision of data and consequences

9.1. Providing personal data is not necessary to use the application. However, if the user wishes to use the application's functionalities fully, e.g. go to the offer of a given facility and consequently create an account or make a booking, providing personal data is required by the controller.

9.1.1. Account creation/booking: providing data is necessary to use selected application functions (performance of a contract).

9.1.2. Marketing, loyalty programme, location, notifications: voluntary.

9.1.3. Consequences of failing to provide data: inability to use the selected service or functionality.

## 10. Profiling and automated decision-making

10.1. When using the application, the controller may profile users, i.e. use selected information about the user to tailor content presented in the application or in communication with the user. Profiling is carried out primarily on the basis of data originating from the user and from the user's activity in the controller's services, in particular such data as: stay history, purchasing habits, preferences regarding hotel services, activity in the application, demographic data or other information available in hotel systems.

10.2. The purpose of profiling is to better tailor the presented content, offers, recommendations, messages or information about hotel services to the user's presumed needs and interests. For

example, the user may be shown content concerning services, packages, amenities or offers which - based on the data held - may be more interesting to the user than other content.

10.3. Profiling may be carried out on the basis of the controller's legitimate interest consisting in marketing its own services, personalising communication and improving the quality of user service, or - where required by law or the selected communication channel (e.g. sending specific marketing content by electronic means) - on the basis of the user's consent. Where the legal basis is consent, the user may withdraw it at any time, which does not affect the lawfulness of processing carried out before its withdrawal.

10.4. The user has the right to object at any time to the processing of their personal data for marketing purposes, including profiling conducted for direct marketing purposes. If such an objection is lodged, the user's data will no longer be processed for these purposes. The objection may be lodged in particular by changing the relevant settings in the application.

10.5. The profiling described above is used to personalise content and messages. The controller does not make decisions concerning users based solely on automated data processing, including profiling, that would produce legal effects concerning them or similarly significantly affect them within the meaning of Article 22 GDPR.

10.6. This means in particular that profiling alone does not automatically lead to refusal of the possibility to make a booking, refusal to provide hotel services or any other decision producing significant effects for the user. The consequence of profiling may, however, be the display to the user of more tailored content, messages, recommendations or offers.

10.7. The controller does not disclose these data to other controllers.

## **11. Transfers of data outside the EEA**

11.1. As a rule, personal data are not transferred outside the European Economic Area.

11.2. If it is necessary to transfer analytical data outside the European Economic Area in connection with the use of analytical services of entities having affiliated entities outside the EEA, standard contractual clauses will be applied in the controller's agreement with such entities.

## **12. Changes to the privacy policy**

12.1. The user is informed of every change to the privacy policy by means of a notification in the application and by updating the document.